

SUMMARY OF THE PROFICIENCY TESTING COMMITTEE MEETING JULY 17, 2001

The Proficiency Testing (PT) Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Tuesday, July 17, 2001, at 1:00 p.m. Eastern Daylight Time (EDT). The meeting was led by its chair, Ms. Barbara Burmeister of the Wisconsin State Laboratory of Hygiene. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to review the status of PT reporting limits (PTRLs) and field of proficiency testing tables, uniform electronic reporting format, analyte codes, analyte groups, formation of a permanent subcommittee of technical experts, standard operating procedures (SOPs), U.S. Environmental Protection Agency (EPA) National Standards Criteria Document, and to address comments and questions received from NELAC stakeholders.*

INTRODUCTION

Ms. Burmeister began the meeting by discussing the minutes from the committee's June 19, 2001 teleconference. The minutes contained some questionable text and therefore had not been distributed to the committee. Rather than delay approval any longer, Ms. Burmeister said that she would remove the questionable text and distribute the minutes for review/comment/approval. She then reviewed the status of the Action Items:

- Ms. Burmeister e-mailed committee members three PT Fields of Testing tables for their review and discussion of PTRL options at this teleconference.
- Ms. Burmeister would like to be included on the agenda for a future teleconference with the Accrediting Authority Workgroup to discuss uniform electronic reporting format. (Dr. Mike Miller plans to broach the subject in today's AA Workgroup meeting following the PT teleconference.)
- PT Committee will finalize the draft analyte codes during today's teleconference (discussed further below).
- Ms. RaeAnn Haynes, Dr. Anand Mudambi, Dr. Ralph Obenauf, and Dr. Miller will coordinate to draft proposed analyte groups for committee review. No action has been taken yet. The draft is due August 7, 2001.
- PT Committee included revised PT Fields of Testing tables on the agenda for today's teleconference.
- Ms. Burmeister has sent to the NELAC Board of Directors (BoD) a proposal to request approval from the BoD to establish a permanent subcommittee of technical experts. This is discussed further below.
- PT Subcommittee on Implementation and Standardization and permanent subcommittee of PT technical experts will gather for face-to-face meetings. (Meeting tentatively planned for early to mid-October 2001.)
- Ms. Burmeister drafted a letter to Mr. James Hanlon, Acting Deputy Assistant Administrator of EPA's Office of Water, regarding the National Standards for Water Proficiency Testing Studies Criteria Document. She is also in communication with the NELAC Director, Ms. Jeanne Hankins.

- The SOP Subcommittee continues to work on the draft SOP for Annual Review of PT Fields of Testing Tables.
- The SOP Subcommittee will prepare a draft SOP for Adding Method Codes and Analyte Codes to Tables.

PT REPORTING LIMITS AND REVISED FIELD OF PROFICIENCY TESTING TABLES

Ms. Burmeister said that she had e-mailed Mr. Chuck Wibby and Mr. Jerry Parr to see if they had received any feedback from those who received draft copies of the tables. At present, she has not received a response. The committee members had no further comments on the tables. Ms. Cindy Nettrour will contact Mr. Wibby to ask him about feedback and to plan another subcommittee meeting. This item will remain on the agenda for the committee's next teleconference.

UNIFORM ELECTRONIC REPORTING FORMAT

Dr. Miller said that he will bring up the topic of uniform electronic reporting at the Accrediting Authority Workgroup's teleconference later today. Ms. Burmeister offered to participate in a meeting if needed.

ANALYTE CODES (FINALIZE)

Recent changes from Mr. Stan Sutton have been incorporated into the list of analyte codes. Since then, no more problems have been found by committee members. Ms. Burmeister said that she will email the final analyte codes to the National Environmental Laboratory Accreditation Program (NELAP) Accrediting Authorities, PT providers, Ms. Hankins, Dr. Ray Wesselman (EPA), and Ms. Reenie Parris (NIST). The PT Committee hopes to encourage non-NELAP states and PT providers to use this list. After the analyte codes are finalized, the committee will focus on technology codes.

ANALYTE GROUPS SUBCOMMITTEE

Ms. Burmeister said that the initial draft of analyte groups from the subcommittee is not due until August 7, 2001. Since the majority of subcommittee members were on vacation, no activity was reported. Ms. Burmeister said that she will email Ms. RaeAnn Haynes about organizing a teleconference to get work started on developing the analyte groups.

FORMATION OF A PERMANENT SUBCOMMITTEE OF TECHNICAL EXPERTS

Ms. Burmeister informed the committee that she had sent a letter to Ms. Silkie Labie (NELAC Chair) about the formation of a permanent subcommittee of technical experts for proficiency testing and that it was on the agenda for the July 12, 2001 BoD meeting. However, she has not received a response yet. Ms. Burmeister will email Ms. Labie to check on the status regarding the permanent subcommittee.

STANDARD OPERATING PROCEDURES (SOP) SUBCOMMITTEE

Ms. Burmeister said that the draft SOPs should be ready for the committee's August 7, 2001 teleconference.

EPA NATIONAL STANDARDS CRITERIA DOCUMENT UPDATE

Ms. Burmeister said that she is pursuing discussions regarding the EPA National Standards Criteria Document with the EPA and she is currently working with Ms. Hankins to identify the correct person to contact. She also said that the PT Committee may have some information for their next teleconference, but if not, discussion will be postponed until August 28, 2001.

COMMENTS/QUESTIONS RECEIVED

S.M. Roberts, Willamette Analytical Lab

Comments were received from Mr. S.M. Roberts about various PT concerns. His first comment was that the standard of evaluation for proficiency testing should not be based on "scientific research" but "commercial feasibility." The committee is aware of the costs associated with proficiency testing, however PTs must be based on scientific principle. Unfortunately, costs are associated with this.

Second, Mr. Roberts stated that his current PT provider is under the impression that NELAC rules require that PT samples in the lyophilized pellet format be presented with dilution bottles supplied by the PT provider. He said that the provider will not consider providing only the lyophilized organisms without explicit approval from NELAC. His concern was about the increased cost of shipping. The PT Committee responded that the NELAC Standard does not specifically require the PT provider to provide dilution bottles with lyophilized samples.

Third, Mr. Roberts asked about the twice-per-year PT schedule (versus annual tests). This question has been asked numerous times and the committee's response is available in the Frequently Asked Questions (FAQs) posted on the NELAC website (item # 3).

Ms. Burmeister said that she will email Mr. Roberts and respond to his comments.

Tom McAninch, Eastman Chemical

Dr. McAninch previously submitted comments about the large disparity between the low end of the concentration ranges of the PT samples and the concentration levels at which many regulated entities operate and/or the concentration limits specified in regulations. He said that this disparity, combined with the scoring system used, will require many in-house labs to extend their calibration ranges beyond that required for their regulated work and therefore, requires a level of performance beyond what is needed to comply with permits and/or regulations. Otherwise, they face the possibility of receiving "Not Acceptable" scores for PT analytes that have acceptance ranges that extend below their normal calibration ranges when PT providers generate PT samples with concentrations at the low end of the allowed range.

His recent comments provided additional information to support his previous submittal. Included were examples of the operating environment of regulated in-house laboratories compared to commercial laboratories. He also stated that a member of EPA's Office of Solid Waste had expressed concern that the PT ranges extended far below the level at which the analytes were regulated and he included spreadsheet examples to demonstrate the problem. One spreadsheet compared the low end of the PT concentration range for Resource Conservation and Recovery Act (RCRA) solids with the two lists of established limits from RCRA. The second compared the low end of the water PT sample and the lower acceptance value with his company permit requirements for RCRA groundwater and Clean Water Act (CWA) wastewater.

Dr. McAninch suggested a possible solution would be to have higher concentration PT samples available for the laboratories. He said that the laboratory can then select the PT samples with ranges that best match the majority of their routine work.

The PT Committee felt that this is a complicated issue. They had considered use of matrices for the field of proficiency testing, but this does not adequately address the problem. Dr. Miller said that he had spoken to Mr. Chuck Wibby (PT provider) who said that it was not a big issue to offer a second level of PT samples. Dr. Miller also offered to take a look at the data collected from the laboratories in New Jersey to see if this has been a problem for them. Ms. Burmeister asked Ms. Cindy Nettrour to include Dr. McAninch in the Proficiency Testing Reporting Limits (PTRL) Subcommittee who is involved with this issue.

Steve Arms, Florida

Mr. Arms submitted two questions. First, he asked whether the PT committee was planning on adding radiochemistry fields of testing to the lists of available PTs (in light of Environmental Resource Associates' [ERA] recent accreditation). Second, he asked about PTs for RCRA water. He said that Florida never felt that it is adequate or fair to substitute the CWA PT for RCRA water. Therefore, if a laboratory attests to the fact that they are only testing water and no soils under RCRA, Florida does not require laboratories to perform PTs for RCRA water. Mr. Arms was concerned about how this can impact reciprocity.

The PT Committee had previously recommended that the NELAC Accrediting Authorities require the CWA PTs for RCRA water and stand by that recommendation. Beyond that, the committee feels it can do no more at this time.

Ms. Burmeister asked if anyone knew how many of the accrediting authorities offer accreditation for RCRA analytes. A committee member responded that perhaps 8 or 9 of the 11 do. Ms. Burmeister then questioned whether they were handling this uniformly. Dr. Miller said that he will bring this up at the Accrediting Authority Workgroup teleconference.

Bob Rucinski, RTC

Mr. Rucinski inquired about the NELAC Standard related to composition of PT samples for corrective action studies. For example, Mr. Rucinski said that for the RCRA volatile organic analytes (VOAs), they try to randomly rotate the required 60% of the analytes so that every analyte in this round may not be in the next round or may not be in the third round. His

customer wanted to know what happens if a laboratory fails an analyte and it is not present in the next two studies.

The committee replied that in the 2001 standard, if a laboratory performs a corrective action study, it must contain the analyte that was failed. Until the 2001 standard is effective (in 2003), the laboratory has an advantage. The corrective action PT sample does not have to contain the analyte in question. Dr. Miller offered to ask the Accrediting Authority Workgroup how they are handling this situation. Ms. Burmeister said that she will email Mr. Rucinski and respond to his question.

MEMBERSHIP AND OUTREACH COMMITTEE UPDATE

Ms. Nettrour provided the committee with a brief summary of the Membership and Outreach Committee's meeting at the Seventh NELAC Annual Meeting (NELAC 7). Ms. Burmeister asked whether Ms. Nettrour had any special tasks as the liaison to the committee. She replied that she sends the committee updates about the PT Committee meetings, but otherwise had done nothing. She said that the Membership and Outreach Committee wants news to post on the website, but other than the regular committee minutes, there has been nothing to report.

CONCLUSION

The meeting was adjourned at 2:00 p.m. EDT. The committee's next meeting is scheduled for Tuesday, August 7, 2001 via teleconference.

**ACTION ITEMS
PROFICIENCY TESTING COMMITTEE MEETING
JULY 17, 2001**

Item No.	Action	Date to be Completed
1.	Ms. Burmeister will delete questionable text from the June 19, 2001 minutes and distribute them to the committee for review/comments/approval.	7/17/01
2.	Ms. Cindy Nettrour will contact Mr. Chuck Wibby about feedback regarding the PT reporting limits and field of proficiency testing tables and to plan another subcommittee meeting.	
3.	Dr. Mike Miller will raise the following topics in the Accrediting Authority Workgroup meeting: uniform electronic formats, PT studies for RCRA-Water analytes, and handling organic analyte corrective action studies if the failed analyte is not present.	7/17/01
4.	Ms. Burmeister will email the final analyte codes to the NELAP Accrediting Authorities, PT Providers, Ms. Jeanne Hankins, Dr. Ray Wesselman, and Ms. Reenie Parris.	
8.	Ms. Burmeister will email Ms. RaeAnn Haynes about organizing a teleconference for the Analyte Groups Subcommittee.	
9.	Ms. Burmeister will email Ms. Silkie Labie to check on the status regarding the formation of a subcommittee of technical experts on proficiency testing.	
10.	Ms. Burmeister will respond to comments received from S.M. Roberts and Bob Rucinski.	
11.	Dr. Miller will review data collected from New Jersey laboratories to study the problem with calibration ranges compared to low-end ranges of the PT acceptance limits.	

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PROFICIENCY TESTING COMMITTEE MEETING
JULY 17, 2001**

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